

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BLUE SPIKE, LLC

Plaintiff,

v.

VERIMATRIX,

Defendant.

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2:16-cv-00329-RWS
LEAD CASE

JURY TRIAL DEMANDED

BLUE SPIKE, LLC

Plaintiff,

v.

MEDIA SCIENCE INCORPORATED,

Defendant.

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2:16-cv-0701-RWS
MEMBER CASE

JURY TRIAL DEMANDED

**DECLARATION OF KIRK J. ANDERSON IN SUPPORT OF PLAINTIFF BLUE
SPIKE'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Kirk Anderson, declare as follows:

1. I am an attorney in the law firm Garteiser Honea, PLLC. We represent Blue Spike, LLC ("Blue Spike") in this lawsuit. I have personal knowledge of the information contained in this declaration and can testify to the truth of these statements. I make this declaration in support of Blue Spike's Opening Claim Construction Brief

2. Attached hereto as **Exhibit 1** is a true and correct copy of the case *Realtime Data, LLC D/B/A IXO v. Packeteer, Inc., et al.*, Case No. 6:08-cv-144 (E.D. Tex. June 22, 2009).

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from a doctoral thesis submitted by Najran Nasser Hamood Al_Dawla titled "Steganography

Enhancement by Combining Text and Image Through Image Processing Techniques,” submitted May 2014.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from a dictionary titled “Electrical Engineering Dictionary,” edited by Phillip A. Laplante, CRC Press LLC, 2000.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from a doctoral thesis excerpt submitted by Christopher Martin titled “Digital image watermarking techniques,” 2000.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from “Applied Cryptography, Second Edition: Protocols, Algorithms, and Source Code in C” by Bruce Schneier, Wiley Computer Publishing, Jan. 1996.

7. Attached hereto as **Exhibit 6** is U.S. Patent No. 8,307,213 titled “Method and System for Digital Watermarking.”

8. Attached hereto as **Exhibit 7** is U.S. Patent No. 8,774,216 titled “Exchange Mechanisms for Digital Information Packages with Bandwidth Securitization Multichannel Digital Watermarks, and Key Management.”

9. Attached hereto as **Exhibit 8** is U.S. Patent No. 7,830,915 titled “Methods and Systems for Managing and Exchanging Digital Information Packages with Bandwidth Securitization Instruments.”

10. Attached hereto as **Exhibit 9** is U.S. Patent No. 7,362,775 titled “Exchange Mechanisms for Digital Information Packages with Bandwidth Securitization, Multichannel Digital Watermarks, and Key Management.”

11. Attached hereto as **Exhibit 10** is U.S. Patent No. 5,889,868 titled

“Optimization Methods for the Insertion, Protection, and Detection of Digital Watermarks in Digitized Data.”

12. Attached hereto as **Exhibit 11** is U.S. Patent No. 7,877,609 titled “Optimization Methods for the Insertion, Protection, and Detection of Digital Watermarks in Digital Data.”

13. Attached hereto as **Exhibit 12** is U.S. Patent No. 7,770,017 titled “Method and System for Digital Watermarking.”

I declare, on May 3, 2017, in Arapahoe County, State of Colorado, and under penalty of perjury under the laws of the United States, that the statements made in this declaration are true and correct.

/s/ Kirk Anderson
Kirk Anderson